

EXHIBIT "A"

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and

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Attorneys for EklecCo NewCo, L.L.C.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
(RICHMOND DIVISION)

In re:

CIRCUIT CITY STORES, INC., *et al.*

Debtors.

Case No. 08-35653-KRH
Jointly Administered
Chapter 11 Proceedings

**DECLARATION OF WILLIAM F. BAKER IN SUPPORT OF EKLECCO NEWCO,
L.L.C.'s RESPONSE TO THE LIQUIDATING TRUST'S EIGHTH OMNIBUS
OBJECTION TO LANDLORD CLAIMS (REDUCTION OF CERTAIN PARTIALLY
INVALID CLAIMS, RECLASSIFICATION OF CERTAIN MISCLASSIFIED CLAIMS,
DISALLOWANCE OF CERTAIN INVALID CLAIMS, DISALLOWANCE OF CERTAIN
LATE FILED CLAIMS, AND DISALLOWANCE OF CERTAIN AMENDED CLAIMS)**

STATE OF NEW YORK)
)SS:
COUNTY OF ONONDAGA)

William F. Baker, being duly sworn, deposes and says:

1. I am Assistant Legal Counsel of Pyramid Management Group, LLC (the
"Management Company"). The Management Company is the managing agent of EklecCo

NewCo, L.L.C. (the "Landlord") which is the owner of a shopping center known as Palisades Center, West Nyack, New York (the "Center").

2. I have personal knowledge of the facts set forth in this Declaration and I may be contacted at: Pyramid Management Group, LLC, 4 Clinton Square, Syracuse, New York 13202, (315) 422-7000.

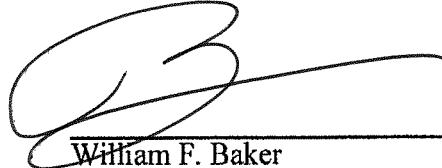
3. The Landlord was a party to a lease (the "Lease") with Circuit City Stores, Inc. (the "Debtor") of premises (the "Premises") at the Center.

4. In the regular course of my employment by the Management Company, I review rent and other charges billed to the Landlord's tenants.

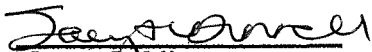
5. The total amount reserved under the Lease from the Debtor's date of filing on November 11, 2008 until the end of the Lease term is \$12,869,837.54. An itemization of this calculation is attached to this Declaration as Schedule 1.

6. Fifteen percent of this rent reserved is \$1,930,475.63.

7. The Landlord's claim for \$1,930,475.63 remains due.


William F. Baker

Sworn to before me this
5 day of April, 2011


Notary Public

SALLY A. O'DONNELL
Notary Public, State of New York
Qualified in Onondaga County
Commission Expires March 30, 2014

SCHEDULE "1"

NET PRESENT VALUE
OF FUTURE PAYMENTS
11/10/2008

TENANT: CIRCUIT CITY - MERCHANT #610104
MALL: PALISADES CENTER
TERM: 20 YEARS
TCD: 01/25/99
SQ. FT.: 33,096
EXPIRATION: 01/31/19
NPV DATE: 11/10/08

YEAR	RATE	RENT	MALL CHG	0.00%	TOTAL
NPV		\$9,453,045.00	\$3,416,792.54	\$12,869,837.54	
		\$6,097,376.47	\$2,223,549.66	\$8,320,926.13	
		\$7,709,695.47	\$2,797,763.54	\$10,507,449.00	

MONTHLY CHARGES (EFFECTIVE 11/10/08)

STEP INCREASE 2/1/09 & 2/1/14	MINIMUM RENT	TAXES	INSURANCE	ENERGY	COMPACTOR	5% CAE	MKT FUND	OTHER	TOTAL
2008	\$68,950.00	\$27,846.72	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$96,796.72
2009	74,466.00	27,846.72	0.00	0.00	0.00	0.00	0.00	0.00	102,312.72
2010	74,466.00	27,846.72	0.00	0.00	0.00	0.00	0.00	0.00	102,312.72
2011	74,466.00	27,846.72	0.00	0.00	0.00	0.00	0.00	0.00	102,312.72
2012	74,466.00	27,846.72	0.00	0.00	0.00	0.00	0.00	0.00	102,312.72
2013	74,466.00	27,846.72	0.00	0.00	0.00	0.00	0.00	0.00	102,312.72
2014	79,982.00	27,846.72	0.00	0.00	0.00	0.00	0.00	0.00	107,828.72
2015	79,982.00	27,846.72	0.00	0.00	0.00	0.00	0.00	0.00	107,828.72
2016	79,982.00	27,846.72	0.00	0.00	0.00	0.00	0.00	0.00	107,828.72
2017	79,982.00	27,846.72	0.00	0.00	0.00	0.00	0.00	0.00	107,828.72
2018	79,982.00	27,846.72	0.00	0.00	0.00	0.00	0.00	0.00	107,828.72
2019	79,982.00	27,846.72	0.00	0.00	0.00	0.00	0.00	0.00	107,828.72

ANNUAL CHARGES (EFFECTIVE 11/10/2008)

STEP INCREASE 2/1/09 & 2/1/14	MINIMUM RENT	TAXES	INSURANCE	ENERGY	COMPACTOR	5% CAE	MKT FUND	OTHER	TOTAL
2008	\$117,215.00	\$47,339.42	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$164,554.42
2009	888,076.00	334,160.64	0.00	0.00	0.00	0.00	0.00	0.00	\$1,222,236.64
2010	893,592.00	334,160.64	0.00	0.00	0.00	0.00	0.00	0.00	\$1,227,752.64
2011	893,592.00	334,160.64	0.00	0.00	0.00	0.00	0.00	0.00	\$1,227,752.64
2012	893,592.00	334,160.64	0.00	0.00	0.00	0.00	0.00	0.00	\$1,227,752.64
2013	893,592.00	334,160.64	0.00	0.00	0.00	0.00	0.00	0.00	\$1,227,752.64
2014	954,268.00	334,160.64	0.00	0.00	0.00	0.00	0.00	0.00	\$1,288,428.64
2015	959,784.00	334,160.64	0.00	0.00	0.00	0.00	0.00	0.00	\$1,293,944.64
2016	959,784.00	334,160.64	0.00	0.00	0.00	0.00	0.00	0.00	\$1,293,944.64
2017	959,784.00	334,160.64	0.00	0.00	0.00	0.00	0.00	0.00	\$1,293,944.64
2018	959,784.00	334,160.64	0.00	0.00	0.00	0.00	0.00	0.00	\$1,293,944.64
2019	79,982.00	27,846.72	0.00	0.00	0.00	0.00	0.00	0.00	\$107,828.72

NPV AS OF 11/10/2008 (DISCOUNTED AT 0%)
NPV AS OF 11/10/2008 (DISCOUNTED AT 9%)
NPV AS OF 11/10/2008 (DISCOUNTED AT 4%)

\$12,869,837.54
\$8,320,926.13
\$10,507,449.00